



**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
)
v.)
)
)
SPENCER RANDOLPH (#17), et. al.)

No. 3:11-00082
JUDGE TRAUGER

UNOPPOSED MOTION TO MODIFY CONDITIONS OF SUPERVISED RELEASE

Undersigned counsel, William J. Steed III, on behalf of Defendant, Spencer Randolph, respectfully files this Motion to Modify Conditions of Supervised Release. The defense files this Motion after consultation with U.S. Probation Officer Amanda Russell, and with Assistant Untied States Attorney, Sunny Koshy. The Government advises that it does not oppose this modification, for reasons set forth herein. U.S.P.O. Russell is Mr. Randolph's supervising probation officer, and she has advised counsel that the requested modification is necessary, for reasons set forth herein. Ms. Russell can provide the Court with additional information about the issues raised, should the Court wish to consult with Ms. Russell prior to granting this Motion.

The defense asks this Court to modify conditions of supervision so as to remove the requirement that Mr. Randolph remain at a "halfway house" (or "reentry center") for one (1) year, as a condition of supervised release. The Judgment reflects this condition of supervision, at page four (4), Supervised Release Special Conditions, Condition 1. See Judgment, Docket No. 1576, p. 4. At sentencing, the parties agreed that Mr. Randolph would spend five (5) years on supervised release, with a condition of one (1) year in a "halfway house" (or "reentry center"), in lieu of imprisonment, given Mr. Randolph's long history of serious medical problems.